

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

MARCUS ANTHONY DELGADO,

Plaintiff,

vs.

HONEYWELL INTERNATIONAL, INC.
d.b.a. HONEYWELL AEROSPACE, a
Delaware corporation,

Defendant.

Case No. 2:19-cv-00395-BJR

**STIPULATED MOTION AND ORDER
TO EXTEND DEADLINES**

STIPULATION

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to move for a stipulated extension of the remaining deadlines in this case by sixty (60) days.

The parties respectfully request that the deadlines be extended in this case based upon the parties' difficulties in scheduling depositions in this case. Plaintiff is unavailable for deposition throughout much of March and April due to his efforts to attain his Master's degree and his new employment. In addition, Plaintiff's counsel's father passed away in December, which has and continues to require him to be out of the state tending to related matters. Finally, Defendant is seeking to depose three medical providers who have scheduling conflicts with dates proposed by Defendant. These issues have made finishing and finalizing discovery extremely difficult and thus, the parties require more time to ensure the case is properly litigated. Allowing for such

1 additional time will not unduly delay or prejudice either party. Pending the Court's granting of
2 this Motion, the parties have agreed to conduct the bulk of the depositions in this case between
3 May 18-22, 2020.

4 WHEREFORE, the parties jointly request that the Court extend the deadline as detailed
5 above for good cause shown.

6 Respectfully Submitted,

7 Dated: February 18, 2020.

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9 LAW OFFICE OF J.D. SMITH, PLLC

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

10 /s/ J.D. Smith (with permission)

10 /s/ Adam T. Pankratz

11 J.D. Smith, WSBA #28246
12 Law Office of J.D. Smith, PLLC
13 8015 SE 28th St., Suite 212
14 Mercer Island, WA 98040
15 Email: jd@jdsmithlaw.com

Adam T. Pankratz, WSBA #50951
1201 Third Avenue, Suite 5150
Seattle, WA 98101
Phone: 206-693-7057
Email: Jaime.cole@ogletree.com

16 *Attorneys for Plaintiff*

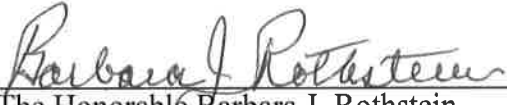
Leah S. Freed, SBN #021332 (*pro hac vice*)
Esplanade Center III, Suite 800
2415 East Camelback Road
Phoenix, AZ 85016
Phone: 602-778-3700
Fax: 602-778-3750
Email: leah.freed@ogletree.com

Attorneys for Defendant

ORDER

PURSUANT TO JOINT MOTION, IT IS SO ORDERED that the remaining deadlines in this case are moved out by 60 days.

DATED this 19th day of February, 2020.


The Honorable Barbara J. Rothstein